

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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In The Matter of the Application of  
SAN DIEGO GAS & ELECTRIC  
COMPANY (U902E) for a Permit to  
Construct The Tie Line (TL) 695 and  
TL 6971 Reconductor Project.

Application 16-04-022  
(Filed April 25, 2016)

**PROTEST  
OF THE OFFICE OF RATEPAYER ADVOCATES**

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May 31, 2016

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**I. INTRODUCTION**

Pursuant to Rule 2.6 of the Commission's Rules of Practices and Procedure, the Office of Ratepayer Advocates (ORA) hereby protests the Application of San Diego Gas & Electric Company (SDG&E), for a Permit to Construct (PTC) the Tie Line (TL) 695 and TL 6971 Reconductor Project.

SDG&E filed the Application on April 25, 2016, and it first appeared on the Commission's Calendar on April 29, 2016, therefore, ORA's protest is timely.

**II. DESCRIPTION OF THE PROJECT**

TL 695 and TL 6971 Reconductor Project (Proposed Project) consists of 10-mile long, 69 kilovolt (kV) power lines in northern San Diego County and southern Orange County, located primarily on federal military lands in the Marine Corps Base Camp Pendleton, with a small portion in the City of San Clemente. SDG&E maintains that the Proposed Project will replace existing conductor, remove existing wood pole structures, and install new steel poles structures in their place.

The Proposed Project will also reconductor 69kV power lines and 12kV distributions lines between the Talega Substation and San Mateo Junction and replace 34

wood pole structures with the installation of approximately 24 power line steel pole structures, “along the existing power line alignment.”<sup>1</sup> South of San Mateo Substation to the Basilone Substation, SDG&E will remove the existing 69kV lines and cut 24 power line pole structures above the distribution and communication lines. TL 695 69kV power line will be added to one of three positions on the west side of 11 lattice towers connecting the northeast area of the San Onofre Nuclear Generating Station (SONGS) with the San Mateo junction.

A 400 foot long portion of TL 695 69kV power line will be placed underground along an east/west alignment within Southern California Edison Company (SCE) right-of-way near SONGS Mesa. The rest of the construction would involve replacing about 47 wood pole structures with 47 steel pole structures between the western underground segment and Basilone Substation, and between the underground segment and the Japanese Mesa Substation<sup>2</sup>.

### **III. PURPOSE OF THE PROJECTS**

SDG&E’s Application claims that the California Independent System Operator’s (CAISO) 2011/2012 Transmission Planning Process (TPP), identified a North American Electric Reliability Corporation (NERC) Category B violation<sup>3</sup> on segments of TL 695, in the event of a loss of TL 690, and that CAISO approved the reconductoring of TL 695, with a 2014 in-service date, to mitigate the overload. However, when the new Basilone Substation was placed in service in 2013, the scope of the original TL 695 reconductoring project as approved in the 2011/2012 TPP changed. The original TL 695 was split in two segments (TL 695 and TL 6971) to feed the Basilone Substation and support the growing load in this area. Line ratings in both segments were adjusted and TL 695 and TL 6971 are limited to 24 and 32 megavolt-amperes (MVA), respectively.

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<sup>1</sup> Appendix B, Draft Notice of Application for Permit to Construct, p. 1.

<sup>2</sup> Id.

<sup>3</sup> According to NERC Reliability Standard TPL 002-02b, Category B is a scenario when there is a single element loss from the bulk electric system.

SDG&E maintains that the Category B violation identified in the 2011/2012 TPP as a result of a loss of TL 690 persists on TL 695 and now includes TL 6971. Therefore, SDG&E seeks this permit to construct the Proposed Project for the following reasons:

1. To eliminate a NERC Category B violation and increase reliability.
2. To increase the fire safety and service reliability of TL 695 and TL 6971.
3. To minimize adverse environmental impacts to the extent feasible.

#### **IV. ISSUES**

ORA is currently reviewing the Application and related documents, including the Proponents Environmental Assessment (PEA) and will soon initiate discovery to further clarify certain aspects of the Application. ORA is concerned that SDG&E only provided a simple diagram showing a very high level relationship between the substations involved in this Proposed Project, but did not provide any electrical interconnection diagrams for the project. Thus, it is difficult to conduct an effective review of the application.

Preliminarily, the Application raises the following issues:

1. Whether NERC Category B violation on TL 695 arises as a result of the loss of one segment of TL 690; SDG&E's Application does not describe TL 690, with respect to its location and its interaction with TL 695 and TL 6971, or reference the relevant portion of the TPP that concluded a Category B violation occurs.
2. What was the purpose of constructing the Basilone Substation after the CAISO TPP 2011/2012 finding of a Category B violation, when it exacerbated the Category B violation and the violation persisted on a new line after the construction?
3. What are the implications of the Basilone Substation to TL 695 and TL 6971 with regard to their NERC Category B violation as identified by SDG&E during the 2011/2012 transmission studies? In general, SDG&E's Application did not articulate the power supply situation changes of the involved substations due to the construction of the Basilone Substation.
4. Why did the NERC Category B violation identified, in the 2011-2012 CAISO TPP, continue to apply to TL 695 as well as the recently created TL 6971, after the Basilone Substation was constructed? SDG&E did not provide any reasons or supportive documents on this assertion.

ORA reserves the right to present additional issues in this proceeding as additional information becomes available in the course of discovery and further review.

## **V. NEED FOR HEARINGS**

At this point in the proceeding, ORA requests hearings, but will work with SDG&E to develop an acceptable hearing schedule that would result in an expedient resolution of the issues.

## **VI. CATEGORIZATION**

ORA agrees with SDG&E that the appropriate categorization for this proceeding is rate setting.

## **VII. PROPOSED SCHEDULE**

ORA is not prepared at this time to submit a schedule for this proceedings and will do so either upon completion of initial discovery or at the time of the Pre-hearing conference, after consultation with SDG&E.

## **VIII. CONCLUSION**

WHEREFORE, ORA submits this protest for the reasons stated.

Respectfully submitted,

/s/ NOEL OBIORA

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Noel Obiora

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